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HON HAI PRECISION INDUSTRY CO.,
LTD. and FOXCONN ELECTRONICS,
INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LOTES CO., LTD., a Taiwan Corporation,

Plaintiff,

v.

HON HAI PRECISION INDUSTRY CO.,
LTD., a Taiwan Corporation, and FOXCONN
ELECTRONICS, INC., a California
Corporation,

Defendants.

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Case No. 3:11-CV-01036 JSW

**STIPULATED REQUEST TO
MODIFY DISCOVERY AND
BRIEFING SCHEDULE, AND TO
CHANGE HEARING DATE
RELATED TO EARLY PARTIAL
SUMMARY JUDGMENT MOTIONS**

Pursuant to Local Rule 6-2, Plaintiff Lotes Co., Ltd (“Plaintiff”) and Defendants Hon Hai Precision Industry Co., Ltd. and Foxconn Electronics, Inc. (“Defendants”) jointly submit this stipulated request to modify the discovery and briefing schedule, and to change the hearing date set by the Court in its January 4, 2012 Order (ECF No. 73).

The parties have agreed to modify the discovery and briefing schedule and to reschedule the hearing date for the motions for partial summary judgment. The parties' proposed revised schedule is as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>New Stipulated Deadline</u>
Deadline to resolve discovery disputes/limited discovery period closes	---	March 12, 2012
Depositions Completed	March 5, 2012	March 19, 2012
Plaintiffs opening brief on Threshold Issues 1 and 2	March 20, 2012	April 3, 2012
Foxconn's Opposition and Cross-Motion due	April 3, 2012	April 17, 2012
Lotes' Reply/Opposition to Cross-Motion brief due	April 17, 2012	May 1, 2012
Foxconn's Reply in Support of Cross-Motion due	April 24, 2012	May 8, 2012
Hearing on Threshold Issues	May 11, 2012	May 25, 2012

The schedule for this case has not yet been set by the Court, and therefore this stipulated request, if granted, would have no effect other than to change the dates stipulated herein.

This request is supported by the Declaration of Laurie Charrington, filed concurrently herewith.

IT IS SO STIPULATED.

Dated: February 27, 2012

JONES DAY

By: /s/ Laurie M. Charrington
Laurie M. Charrington

Counsel for Defendants
HON HAI PRECISION INDUSTRY CO. LTD.,
and FOXCONN ELECTRONICS, INC.

1 In accordance with General Order No. 45, Section X(B), the above signatory attests that
2 concurrence in the filing of this document has been obtained from the signatory below.

3 Dated: February 27, 2012

SHEPPARD MULLIN RICHTER &
HAMPTON LLP

4 By /s/ James Chadwick
James Chadwick

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7 Counsel for Plaintiff
8 LOTES CO. LTD.

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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11 DATED: March 2, 2012

12 By 
Hon. Jeffrey S. White

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